ings would not

be recognized by one of skill in the art as the same issue or corresponding problems.

Furthermore, the Examiner heavily relies on the NA New corpus as a "large

collection" by stating that "this size reduction is especially relevant since Singhal's search is

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performed over a large collection (p. 243, sec. 3.2, para. 1,.....)". However, the "large

collection" is not what the Examiner characterizes it to be. In Section 3.2, Singhal discusses

the retrieval system and notes that the NA News corpus was used "as the large collection for

conservative collection enrichment (see Section 2.2)." When Section 2.2 is reviewed, it

becomes clear that the large collection is utilized by some researches as a "collection

enrichment" tool. A pass is run on a larger collection then the target collection so that an

assumption of relevance of documents may be strengthened. The large collection is therefore

not as the Examiner asserts. Singhal's search is not performed over a large collection.

Rather, Singhal actually teaches that term selection and the final weights of the search terms

in the target database are proposed by the top documents from the effect of collection

enrichment which uses the large collection to make these modifications to the search. A

detailed review of Section 2.2 will make this point clear that the large collection is not the

target collection that is actually searched.

Accordingly, Applicants respectfully submit that their argument stands – namely that

one of skill in the art would not find the motivation articulated by the Examiner to combine

these references for the purpose of reducing the database size since the search database is

already small in Singhal. The Examiner cannot rely on the large collection in Singhal

because it is only used for collective enrichment as taught by Singhal and is not a search

database. Therefore, Applicants maintain that there is not sufficient motivation to combine

under a preponderance of the evidence standard.

Regarding point (2), Applicants recognize that Hutson does not explicitly state that

speech recognition is error free. However, other than mentioning that the text-data that is

processed may be a result of speech recognition (col. 2, line 11), they do not make any

mention of how to deal with errors in speech recognition. The explicitly identified problem

in Hutson is being "inundated with large amounts of redundant and often worthless

information" as a result of large amounts of information. In this regard, the suppression of

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words in Hutson's process as it is taught is not due to errors in speech recognition but due to

data volume. The mention of speech recognition is in the context of how the large volume of

text data may be obtained – not in the errors that may be found within the text itself. For

example, the "worthless" information is not information that contains errors, but information

that is termed "data pollution" because it is so voluminous that the user who searched for data

may not be inclined to read through the large number of articles on the subject. See col. 1,

lines 37 – 47. Applicants respectfully submit that a fair reading of what is taught by Hutson

to be "worthless" does not encompass terms in vectors that are not recognized by the

recognizer.

Also, on point (2), the Examiner again relies on keeping the search space as small as

possible as a reason for combining, which has been addressed above. Applicants respectfully

submit that the motivation to combine is a decision that is weighed on both sides with the

preponderance of the evidence standard being the guiding standard to apply. Applicants

have answered the Examiner's previous argument and current argument being the NA New

corpus as the large collection. This is the cornerstone of the Examiner's case for sufficient

motivation to combine. Since the NA New corpus is not a large collection that is used for a

search as is taught in Singhal, Applicants submit that this and the other reasons set forth

above tip the scale in the favor of the claims being patentable over the cited references.

Accordingly, Applicants submit that Hutson should not be combined with Singhal and

that claims 1 – 20 are patentable.

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CONCLUSION

Having addressed all rejections, Applicants respectfully submit that the subject

application is in condition for allowance and a Notice to that effect is earnestly solicited.

Respectfully submitted,

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